

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Misc. No. 17-151-LPS
	)	
BOLIVARIAN REPUBLIC OF	)	
VENEZUELA,	)	
	)	
Defendant.	)	

**SPECIAL MASTER’S RESPONSE TO RED TREE INVESTMENTS, LLC’S MOTION  
FOR AN ORDER ENTERING A DISCOVERY SCHEDULE**

Robert B. Pincus, in his capacity as special master for the United States District Court for the District of Delaware in the above-captioned case (the “**Special Master**”),<sup>1</sup> respectfully submits this response to Red Tree Investments, LLC’s Motion for an Order Entering a Discovery Schedule (the “**Red Tree Motion**”), D.I. 1756, as directed by the Court in its May 27, 2025 Oral Order, D.I. 1769.

The Special Master supports an orderly and efficient process leading up to the Sale Hearing and generally defers to the anticipated litigants regarding the specific dates, e.g., timing of expert reports. As far as the proposed schedule impacts the Special Master’s own work, he is amenable to setting a *target* document production deadline so long as it allows sufficient time to collect, review, and produce documents after submitting his Final Recommendation. The Special Master does not oppose the deadlines proposed in the Red Tree Motion, which he understands were

---

<sup>1</sup> All capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the *Sixth Revised Proposed Order (A) Establishing Sale and Bidding Procedures, (B) Approving Special Master’s Report and Recommendation Regarding Proposed Sale Procedures Order, (C) Affirming Retention of Evercore as Investment Banker by Special Master and (D) Regarding Related Matters* (D.I. 481) (the “**Sale Procedures Order**”).

negotiated with CITGO and PDVH, if the deadlines for the sale process currently set by the Court remain in place. However, in light of the Venezuela Parties' pending Motion to Extend the Topping Period and related filings (D.I. 1757, D.I. 1759–1765, 1767–1768, 1770), the specific dates in the Red Tree Motion may need to be adjusted if the Topping Period is extended, and based on any changes to the rest of the case schedule.

Respectfully submitted,

POTTER ANDERSON & CORROON LLP

OF COUNSEL:

Matthew S. Barr (Admitted *pro hac vice*)  
David Lender (Admitted *pro hac vice*)  
Jared R. Friedmann (Admitted *pro hac vice*)  
Chase A. Bentley (Admitted *pro hac vice*)  
WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007  
Matt.Barr@weil.com  
David.Lender@weil.com  
Jared.Friedmann@weil.com  
Chase.Bentley@weil.com

By: /s/ Myron T. Steele

Myron T. Steele (#0002)  
Matthew F. Davis (#4696)  
Bindu A. Palapura (#5370)  
Hercules Plaza, 6<sup>th</sup> Floor  
1313 North Market Street  
P.O. Box 951  
Wilmington, DE 19801  
Telephone: (302) 984-6000  
Facsimile: (302) 658-1192  
msteele@potteranderson.com  
mdavis@potteranderson.com  
bpalapura@potteranderson.com

*Counsel for Special Master Robert B. Pincus*

Dated: May 28, 2025  
12256427 / 21202.00001